

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
2:12-cv-02040-JAD-PAL

FILED	RECEIVED
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COUNSEL/PARTIES OF RECORD	
APR - 8 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

CRYSTAL L. COX,
Defendant, Counter Plaintiff

v.

MARC J. RANDAZZA,
Plaintiffs, Counter Defendant

Motion in Limine
to Include Exhibit 18, 18a, 18b, 18c

Exhibit 18, 18a, 18b, 18c, shows initial contact with Randazza, which was not Cox.

Exhibit 18 shows Randazza seeking documents of Cox's case. This was after their phone call when Cox told Randazza her legal strategy and plan moving forward and then send him all requested files of her case.

18a shows that Blogger Michael Spreadbury clearly told randazza that the call was to seek representations. It was all about talking with Cox, about representation.

18a Says, "As a contributor to Crystal Cox's blogs, this correspondence seeks representation for her. "

Cox moves this court to accept 18a, 18b, 18c, into evidence to prove that Randazza was sought for representation, had a conference call on the matter, asked for Cox's files, and agreed to represent Cox in the matter.

Crystal L. Cox, Pro Se
Counter Plaintiff / Defendant

Crystal L. Cox

Certification of Service

On April 6th, 2015, Crystal Cox certifies mailing a copy of this to:

Crystal L. Cox

U.S. District Court
Clerk of Court
Room 1334
333 Las Vegas Blvd. S.
Las Vegas , NV 89101

Cyber 201

Ch 2

YAHOO! MAIL

Subject RE: Phone conference 12/10/11
From mjr@randazza.com <mjr@randazza.com>
To Michael Spreadbury <mspread@hotmail.com>
CC crystal <crystal@crystalcox.com>
Date Sat, Dec 10, 2011 at 1:32 PM

Great. Call me on my home land line at 702-685-0555

—— Original Message ——

Subject: Phone conference 12/10/11
From: Michael Spreadbury <mspread@hotmail.com>
Date: Sat, December 10, 2011 1:27 pm
To: <mjr@randazza.com>
Cc: crystal <crystal@crystalcox.com>

Mr. Randazza,

I just conversed with Ms. Cox, and we will attempt a conference within the half hour. Most likely within 15 minutes.

Thank you.

2:30 PM Mountain time presently.

Michael Spreadbury

Exhibit 189

YAHOO! MAIL

Subject RE: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ

From mjr@randazza.com <mjr@randazza.com>

To Crystal L. Cox <savvybroker@yahoo.com>

CC J. DeVoy <jmd@randazza.com>

Date Sat, Dec 10, 2011 at 3:05 PM

Crystal,

Can you set up a dropbox for this all? This is going to take me hours to download it all and organize it. A dropbox would be way easier.

—— Original Message ——

Subject: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ

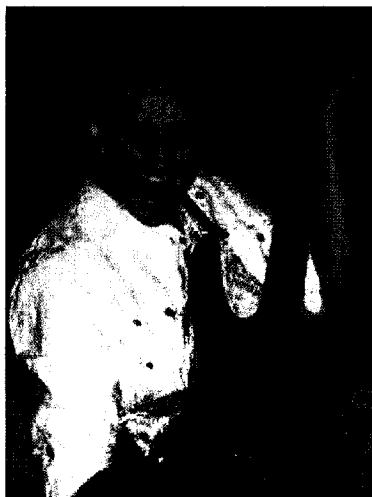
From: "Crystal L. Cox" <savvybroker@yahoo.com>

Date: Sat, December 10, 2011 2:31 pm

To: "mjr@randazza.com" <mjr@randazza.com>

Crystal L. Cox

Broker Owner



Search Engine Reputation Manager

Investigative Blogger

Good Life International Distributor

Peace and Love to You !!!

—— Forwarded Message ——

From: "Michelle_Rawson@ord.uscourts.gov" <Michelle_Rawson@ord.uscourts.gov>

To: Crystal L. Cox <savvybroker@yahoo.com>

Sent: Monday, December 5, 2011 1:04 PM

Subject: Obsidian Finance v. Cox 3:11-CV-00057-HZ

Hi there,

EWB 18

Just in case you need these and didn't get copies, or don't have access via PACER. These are the rest of the trial documents.



Michelle Rawson

(503) 326-8051

Courtroom Deputy for

The Honorable MARCO A. HERNANDEZ

United States District Court Judge

EXHIBIT 18

YAHOO! MAIL

Subject RE: representation for Blog owner
From mjr@randazza.com <mjr@randazza.com>
To Michael Spreadbury <mspread@hotmail.com>
CC crystal <crystal@crystalcox.com>
Date Sat, Dec 10, 2011 at 12:51 PM

Early next week is a mess. I have hearings in Phoenix and Miami. Today is really good though.

—— Original Message ——

Subject: RE: representation for Blog owner
From: Michael Spreadbury <mspread@hotmail.com>
Date: Sat, December 10, 2011 12:48 pm
To: <mjr@randazza.com>
Cc: crystal <crystal@crystalcox.com>

Mr. Randazza,

Thank you for your response. Ms. Cox and I would like to call you early next week. Please indicate if any day or time is more preferable to you.

Michael Spreadbury
(406) 363-3877

From: mjr@randazza.com
To: mspread@hotmail.com
CC: rlqall@randazza.com; lake@law-works.com
Subject: RE: representation for Blog owner
Date: Sat, 10 Dec 2011 12:12:52 -0700

Michael,

Thank you for your inquiry.

Please call me. Please have Ms. Cox on the line.

Marc John Randazza*
Randazza Legal Group

6525 West Warm Springs Rd. Ste. 100
Las Vegas, Nevada 89118

Exhibit 18

Toll Free: 888-667-1113
email: mjr (at) randazza (dot) com
eFax: 305.437.7662

Other Offices: Miami, Phoenix & Toronto
<http://www.randazza.com>

* Licensed in MA, FL, CA, and AZ only. (Not admitted in NV)

—— Original Message ——

Subject: representation for Blog owner
From: Michael Spreadbury <mspread@hotmail.com>
Date: Sat, December 10, 2011 9:57 am
To: <mjr@randazza.com>

Mr. Marc Randazza esq.,
Randazza Law of Massachusetts, California, Arizona, & Florida

Dear Mr. Randazza,

I was fortunate to read the correspondence you sent on behalf of Ms. Alkon, a blogger who recounted an encounter with a TSA agent on her blog, your subsequent response to allegations by the TSA agent of Emotional Distress, and the request to cease publishing information on the encounter.

As a contributor to Crystal Cox's blogs, this correspondence seeks representation for her. As you are probably aware, Ms. Cox's issue in a Oregon US District Court has made national attention in the past few weeks. To protect the speech of all blog writers in the United States, an effective appeal to The 9th Circuit Court of Appeals in the *Obsidian Finance* case needs to be crafted. Due to your passion to assist Ms. Alkon, I would request that your firm take the *Obsidian Finance* case, or establish a credible source that will.

The Wall St. Journal, Businessweek, New York Times, and several others have made precedent that Americans have seen; a chill of free speech for blog writers; not what America needs at this juncture in our history. Absent the facts, many have said the US District Judge misapplied a "shield law" applies only to trained journalists or their outlets, and not (as the Oregon Statutes is written) to those who otherwise communicate to the public as blog writers, such as Ms. Cox does freely.

I humbly assert that positive attention gained by representing, and defending Ms. Cox would more than pay for the services provided in her defense.

Thank you for your consideration of this request.

Michael Spreadbury

contact info for Ms. Cox; crystal@crystalcox.com

Exhibit 189

Crystal,

Can you set up a dropbox for this all? This is going to take me hours to download it all and organize it. A dropbox would be way easier.

—— Original Message ——

Subject: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ

From: "Crystal L. Cox" <savvybroker@yahoo.com>

Date: Sat, December 10, 2011 2:31 pm

To: "mjr@randazza.com" <mjr@randazza.com>

Crystal L. Cox

Broker Owner



Search Engine Reputation Manager

Investigative Blogger

Good Life International Distributor

Peace and Love to You !!!

—— Forwarded Message ——

From: "Michelle_Rawson@ord.uscourts.gov" <Michelle_Rawson@ord.uscourts.gov>

To: Crystal L. Cox <savvybroker@yahoo.com>

Sent: Monday, December 5, 2011 1:04 PM

Subject: Obsidian Finance v. Cox 3:11-CV-00057-HZ

Hi there,

Just in case you need these and didn't get copies, or don't have access via PACER. These are the rest of the trial documents.

EXHIBIT 18C

YAHOO! MAIL

Subject RE: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ
From mjr@randazza.com <mjr@randazza.com>
To Crystal L. Cox <savvybroker@yahoo.com>
Date Sat, Dec 10, 2011 at 3:32 PM

<http://lmgty.com/?q=dropbox>

—— Original Message ——

Subject: Re: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ
From: "Crystal L. Cox" <savvybroker@yahoo.com>
Date: Sat, December 10, 2011 3:16 pm
To: "mjr@randazza.com" <mjr@randazza.com>

I don't know how to do that.

Not sure what you mean, Sorry.

Crystal L. Cox
Broker Owner



Search Engine Reputation Manager
Investigative Blogger
Good Life International Distributor

Peace and Love to You !!!

From: "mjr@randazza.com" <mjr@randazza.com>
To: Crystal L. Cox <savvybroker@yahoo.com>
Cc: J. DeVoy <jmd@randazza.com>
Sent: Saturday, December 10, 2011 4:05 PM
Subject: RE: Fw: Obsidian Finance v. Cox 3:11-CV-00057-HZ

18

Exhibit 18B

YAHOO! MAIL

Subject RE: Discovery, Summary Judgement,
From mjr@randazza.com <mjr@randazza.com>
To Crystal L. Cox <savvybroker@yahoo.com>
Date Wed, Dec 14, 2011 at 5:06 PM

Crystal,

I have reviewed the file, and I have pondered the issues, and I have decided that I will take your case. We need to talk about some of the issues of representation before finalizing it. But, I am game.

When can you talk?

—— Original Message ——

Subject: Discovery, Summary Judgement,
From: "Crystal L. Cox" <savvybroker@yahoo.com>
Date: Sat, December 10, 2011 2:54 pm
To: "mjr@randazza.com" <mjr@randazza.com>

Crystal L. Cox
Broker Owner



Search Engine Reputation Manager
Investigative Blogger
Good Life International Distributor

Peace and Love to You !!!